

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
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Center for Medicaid and State Operations/Survey and Certification Group

From: Director  
Division of Laboratory Services

Subject: Cytology Proficiency Testing Requirements for Residents and Fellows

CMS has been asked to review the requirement for residents and fellows in Cytopathology programs to participate in a CMS-approved Cytology Proficiency Testing Program. Based on the information submitted by the Accreditation Council for Graduate Medical Education and the American Board of Pathology, and communications with the cytology community, CMS has determined the following:

- Residents would not be required to participate in a CMS-approved Cytology Proficiency Testing Program. Pathology residents are not board-certified and are under the constant supervision of fully licensed physicians.
- Since fellows in Cytopathology Programs have completed their residency programs and have increasing responsibilities in the cytology laboratory, participation in proficiency testing may be required.
  - o Those Fellows whose responsibilities in the laboratory include the examination and final diagnosis of gynecologic specimens must enroll and participate in a CMS-approved Cytology Proficiency Testing Program.
  - o Fellows who do not render a final diagnosis on gynecologic specimens are not required to participate in a CMS-approved Cytology Proficiency Testing Program.